



William Kennard Chair Federal Communications Commission 2000 M Street, NW #548 Washington, DC 20554 RECEIVED

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PENERAL COMMUNICATIONS COMMISSION OFFICE OF THE SECRETARY

February 25, 1999

Dear Chairman Kennard,

Libraries for the Future (LFF) fully supports the position of the Microradio Empowerment Coalition with regard to granting new low-powered radio licenses.

LFF is a not-for-profit organization dedicated to information equity, literacy and the preservation and renewal of libraries as essential tools for a democratic society. Like the Microradio Empowerment Coalition, LFF believes that democracy depends on community access to information and culture.

Unfortunately, both information and culture are increasingly becoming commodities. In this environment, we not only need strong public library systems, but strong public communications systems as well. Microradio provides a perfect medium for building such a system. In particular, designating spectrum for *non-commercial* microradio use is vitally important to avoid commodifying this valuable tool of community building and democracy. If public libraries were supported by advertisers, their credibility and the diversity of information in their collections would be severely limited. Only by designating spectrum as non-commercial can a truly vibrant, diverse and community based microradio communications system be built.

In particular, Libraries for the Future supports:

- 1. Non-commercial service
- 2. Only one station per license holder
- 3. Local license holding, no absentee licensees
- 4. Stations will be locally programmed. However recorded materials such as music, poetry, documentaries, features etc. may be used. Sharing of program materials and resources among micro and community stations is strongly encouraged. No more than 20% of air time from off-site feeds or syndicated tapes.
- 5. That licensees be unincorporated not-for-profit associations, or non profit organizations.
- 6. That equipment shall be "type accepted" which meet basic technical criteria in respect to stability, filtering, modulation control, etc.

- 7. That problems, whether technical or otherwise, shall be first referred to the local or regional voluntary microradio organization for technical assistance or voluntary mediation. The FCC shall be the forum of last resort.
- 8. Amnesty and return of property for microbroadcasters who suffered government seizure of property and fines. No penalization of microradio pioneers in any upcoming licensing system.
- 9. That licensing fees shall be affordable to all communities.
- 10. That within two years new spectrum space shall be allocated for continued expansion of microradio broadcasters so that any community group that wishes to broadcast has access to available spectrum space (frequencies). Further, all manufacturers of consumer radio receivers for sale in the United States shall be required to include this spectrum set aside for microradio broadcasters.

We strongly urge the FCC to fully support the public potential of this medium by designating commercial free spectrum.

Sincerely,

/Jamie McClelland

Technology and Policy Specialist

Libraries for the Future

cc: Susan Ness, Harold Furchgott-Roth, Michael Powell, Gloria Tristani